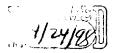


Melaleuca, Inc.

3910 South Yellowstone t Iwy Idaho Falls, Idaho **83402-6003** 208 522-0700

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April 20, 1998



Office of Special Nutritional (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, DC 20204

Re: SECTION 403(r)(6) NOTIFICATION

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Melaleuca, Inc., notifies FDA that it has begun using the following statements:

Maintains normal urinary function.

Neutralizes free radicals.

Lycopene provides protection against free radicals, the toxic compounds that can harm the cells in the body--including those in the prostate.

These statements contain the statutory disclaimer. The name of the dietary supplement is ProstAvan™, and the relevant dietary ingredients are saw palmetto berry extract, pumpkin seed extract, and lycopene extract.

I certify that the foregoing is complete and accurate, and that Melaleuca, Inc., has substantiation that the statements are truthful and not misleading.

Very truly yours,

Melaleuca, Inc.

Brett L. Merrell

V.P. Product Marketing

LET 1591